

**From:** [Ari Herbert](#)  
**To:** [Kenneth Parreno](#); [Frank Chang](#); [Patrick Strawbridge](#); [Freeman, Daniel \(CRT\)](#); [Berlin, Holly \(CRT\)](#)  
**Cc:** [Nina Perales](#); [Sean McCaffity](#); [Fatima Menendez](#); [Patrick Sweeten](#); [Will Thompson](#); [Zachary Berg](#); [Munera Al-Fuhaid](#)  
**Subject:** RE: TX Redistricting - Deadline to File Private Plaintiffs' Reply In Support of Their Motion to Compel Regarding Legislative Privilege Assertions  
**Date:** Wednesday, August 24, 2022 4:45:00 PM

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Kenneth,

Please note for the Court that we do not oppose an extension to Monday, August 29, but we would oppose your motion insofar as it seeks an extension beyond then.

Thanks,  
Ari

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**From:** Kenneth Parreno <Kparreno@MALDEF.org>  
**Sent:** Wednesday, August 24, 2022 2:38 PM  
**To:** Ari Herbert <Ari.Herbert@oag.texas.gov>; Frank Chang <frank@consovoymccarthy.com>; Patrick Strawbridge <patrick@consovoymccarthy.com>; Freeman, Daniel (CRT) <Daniel.Freeman@usdoj.gov>; Berlin, Holly (CRT) <Holly.Berlin@usdoj.gov>  
**Cc:** Nina Perales <nperales@MALDEF.org>; Sean McCaffity <SMcCaffity@texttrial.com>; Fatima Menendez <fmenendez@MALDEF.org>; Patrick Sweeten <Patrick.Sweeten@oag.texas.gov>; Will Thompson <Will.Thompson@oag.texas.gov>; Zachary Berg <Zachary.Berg@oag.texas.gov>; Munera Al-Fuhaid <Munera.Al-Fuhaid@oag.texas.gov>  
**Subject:** Re: TX Redistricting - Deadline to File Private Plaintiffs' Reply In Support of Their Motion to Compel Regarding Legislative Privilege Assertions

Hi Ari,

Thanks for the response. We appreciate the offer to agreeing to extend the deadline to August 29, 2022, but we're still going to make the request to extend the reply deadline to Wednesday, August 31, 2022. We intend to file our motion by close of business today. Could you let us know if the Legislators will oppose that request?

Thanks,

Kenneth

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**From:** Ari Herbert <[Ari.Herbert@oag.texas.gov](mailto:Ari.Herbert@oag.texas.gov)>  
**Sent:** Wednesday, August 24, 2022 10:36 AM  
**To:** Kenneth Parreno; Frank Chang; Patrick Strawbridge; Freeman, Daniel (CRT); Berlin, Holly (CRT)  
**Cc:** Nina Perales; Sean McCaffity; Fatima Menendez; Patrick Sweeten; Will Thompson; Zachary Berg;

Munera Al-Fuhaid

**Subject:** RE: TX Redistricting - Deadline to File Private Plaintiffs' Reply In Support of Their Motion to Compel Regarding Legislative Privilege Assertions

Kenneth,

Thanks for your email. We appreciate how busy things are for all counsel. On the other hand, there is also the competing interest of resolving these motions sooner rather than later. With that in mind, we would be willing to agree to an extension for the private plaintiffs' reply to Monday, August 29. Would that be workable?

Sincerely,  
Ari

**Ari M. Herbert**  
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**From:** Kenneth Parreno <[kparreno@MALDEF.org](mailto:kparreno@MALDEF.org)>  
**Sent:** Tuesday, August 23, 2022 2:01 PM  
**To:** Frank Chang <[frank@consovoymccarthy.com](mailto:frank@consovoymccarthy.com)>; Ari Herbert <[Ari.Herbert@oag.texas.gov](mailto:Ari.Herbert@oag.texas.gov)>; Patrick Strawbridge <[patrick@consovoymccarthy.com](mailto:patrick@consovoymccarthy.com)>; Freeman, Daniel (CRT) <[Daniel.Freeman@usdoj.gov](mailto:Daniel.Freeman@usdoj.gov)>; Berlin, Holly (CRT) <[Holly.Berlin@usdoj.gov](mailto:Holly.Berlin@usdoj.gov)>  
**Cc:** Nina Perales <[nperales@MALDEF.org](mailto:nperales@MALDEF.org)>; Sean McCaffity <[SMcCaffity@texttrial.com](mailto:SMcCaffity@texttrial.com)>; Fatima Menendez <[fmenendez@MALDEF.org](mailto:fmenendez@MALDEF.org)>  
**Subject:** TX Redistricting - Deadline to File Private Plaintiffs' Reply In Support of Their Motion to Compel Regarding Legislative Privilege Assertions

Good afternoon,

As y'all know, Private Plaintiffs' deadline to file their reply in support of their motion to compel regarding portions of depositions subject to legislative privilege objections is Friday, August 26, 2022. In light of other briefing deadlines, Private Plaintiffs will file a motion requesting an extension to file that reply by Wednesday, August 31, 2022. Please let us know if the Legislators or the United States will oppose that motion.

Thank you,

Kenneth

Kenneth Parreno  
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